

## REMARKS

### I. Introduction

Claims 12 to 24 are pending in the present application. In view of the foregoing amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

### II. Rejection of Claims 12 to 18 and 23 Under 35 U.S.C. § 102(b)

Claims 12 to 18 and 23 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent Application Publication No. 2003/0080635 (“Bacile et al.”). It is respectfully submitted that Bacile et al. does not anticipate these claims for at least the following reasons.

Bacile et al. describes a motor housing assembly (10) in which an electric motor (14) is accommodated. A housing (74) of the motor housing assembly (10) includes a notch (122), which the Final Office Action considers to constitute an electrical connection element opening, and in which a connector (50) of the electric motor (14) is situated. In addition, the assembly (10) includes a power cord (66) and corresponding plug (70), which is received in the connector (50) and provides electrical power to the motor (14). The combination of the connector (50) and the plug (70) is considered by the Final Office Action to constitute an electrical connection element. Furthermore, as is apparent from paragraph [0019] of Bacile et al., the notch (122) is larger than the connector (50), and therefore, an outer surface (58) of a connector wall (54) of connector (50) does not directly contact a central portion (90) of the housing (74), and a piece of sealing and vibration isolating material (124) is placed in a gap between the connector (50) and the notch (122) for sealing and isolating purposes. However, Bacile et al. does not disclose, or even suggest, the feature of claim 12 that an electrical connection element includes a plate-shaped collar that covers an electrical connection element opening from outside of a motor housing, such that a vertical projection of the plate-shaped collar onto an outer surface of the motor housing completely encompasses the electrical connection element opening. As is apparent from Figures 1 and 3 of Bacile et al., a base section of connector (50) situated below locking feature (72), which base section the Final Office Action apparently considers to constitute a plate-shaped collar, does not cover the notch (122)

**from outside of the housing (74). Furthermore, as is particularly apparent from Figure 3, a vertical projection of the plug (70) onto an outer surface of central portion (90) of housing (74), which plug (70) mates with connector (50) and covers the base section of connector (50) in the mated state, does not encompass the notch (122), as sealing and vibration isolating element (124) is situated in the gap between plug (70) and body portion (106) of housing (74).**

Accordingly, it is respectfully submitted that Bacile et al. does not anticipate claim 12 or dependent claims 13 to 18 and 23 for at least the reasons set forth above.

In view of the foregoing, withdrawal of this rejection is respectfully requested.

### **III. Rejection of Claims 19 to 22 and 24 Under 35 U.S.C. § 103(a)**

Claims 19 to 22 and 24 were rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Bacile et al. and U.S. Patent No. 4,690,366 (“Loup”). It is respectfully submitted that the combination of Bacile et al. and Loup does not render these claims unpatentable for at least the following reasons.

Claims 19 to 22 and 24 ultimately depend from claim 12 and therefore include all of the features of claim 12. As set forth above, Bacile et al. does not disclose, or even suggest, all of the features of claim 12. In addition, Loup describes a system for retaining an electric motor (10) in a housing (24) but does disclose, or even suggest, all of the features of claim 12 not disclosed or suggested by Bacile et al. Accordingly, it is respectfully submitted that the combination of Bacile et al. and Loup does not render unpatentable claims 19 to 22 and 24, which depend from claim 12.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

**IV. Conclusion**

In light of the foregoing, Applicants respectfully submit that all pending claims are in condition for allowance. Prompt reconsideration and allowance of the present application are therefore earnestly solicited.

Respectfully submitted,

Dated: January 13, 2010

/Clifford A. Ulrich/  
By Clifford A. Ulrich, Reg. No. 42,194 for  
Gerard A. Messina (Reg. No. 35,952)  
KENYON & KENYON LLP  
One Broadway  
New York, NY 10004  
(212) 425-7200

**CUSTOMER NO. 26646**